

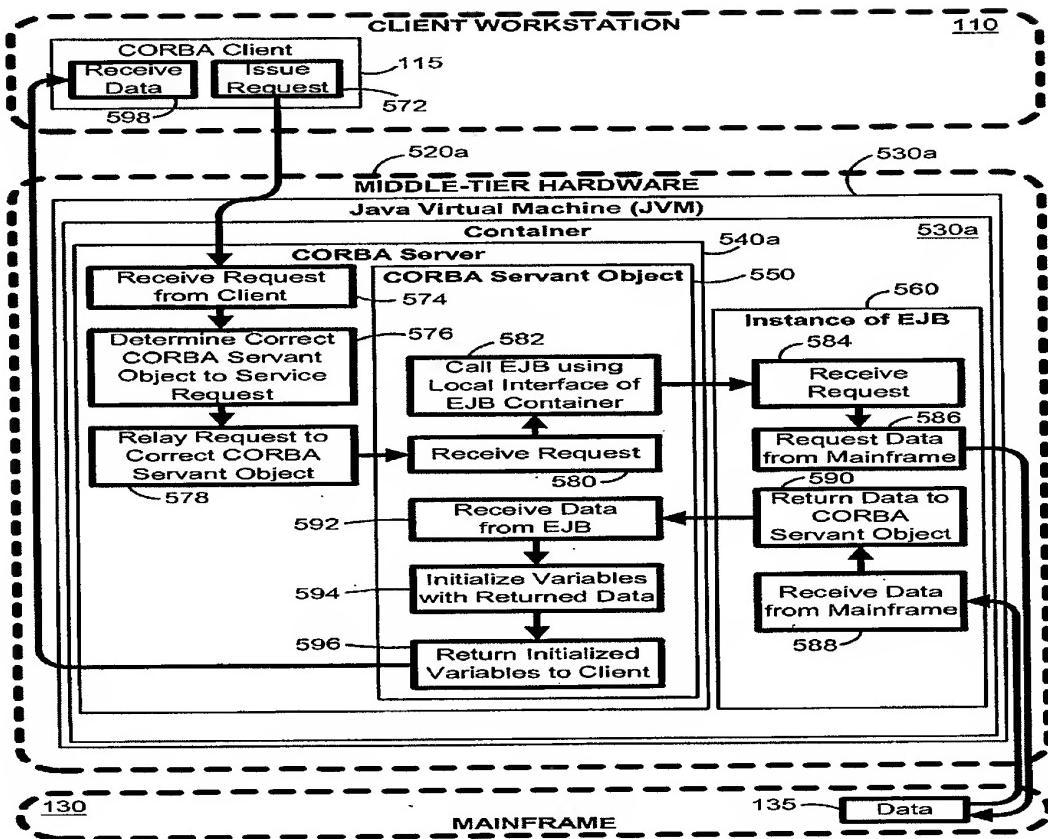
REMARKS

In the outstanding Final Office Action, claims 1, 9 and 17 were rejected under 35 U.S.C. §102(e) over BLACK et al. (U.S. Patent Application Publication No. 2004/0039800). Claims 2-8, 10-16 and 18-25 were rejected under 35 U.S.C. §103(a) over BLACK in view of SCHUNK et al. (U.S. Patent No. 6,980,515).

Applicants traverse each of the outstanding rejections, for at least the reasons set forth below. Applicants initially note, however, that despite Applicants' specific request, the Final Office Action again fails to specify which of the features of BLACK is believed to disclose an encapsulated CORBA interface to the CORBA enterprise information system; or a resource adapter comprising the encapsulated CORBA interface, each of which is recited in claim 1.

Insofar as each of the above-noted features is recited as a distinct feature of claim 1, the Final Office Action fails to establish a *prima facie* showing that the above-noted features of claim 1 are, in fact, disclosed by the features shown in Figure 5B of BLACK. Further, as previously noted, it is inappropriate for the Final Office Action to place a burden on Applicants to guess the interpretation of Figure 5B of BLACK intended in the Final Office Action.

The Final Office Action asserts that BLACK discloses the features of claim 1 at columns [0060]-[0063] and in Figure 5B. In particular, the Final Office Action asserts that Figure 5B of BLACK discloses a "CORBA server" 540a and a "J2EE server" 560. A copy of Figure 5B of BLACK is reproduced below.

**FIG. 5B**

The rejection of claims 1, 9 and 17 over BLACK does not reflect proper consideration of the features recited in claims 1, 9 and 17. In this regard, claim 1 recites a method of managing connections between a Java 2 enterprise edition (J2EE) application server and a remote common object request broker architecture (CORBA) enterprise information system, comprising: integrating a resource adapter with the J2EE application server, the resource adapter comprising an encapsulated CORBA interface to the remote CORBA enterprise information system; and establishing a persistent CORBA connection between the J2EE application server and the remote CORBA enterprise information system.

The cited teachings of BLACK do not disclose “integrating a resource adaptor with the J2EE application server, the resource adapter comprising an encapsulated CORBA interface” as recited in claim 1. As shown in element 582 of Figure 5B of BLACK, a “local interface” of an Enterprise Java Bean Container is used to call the instance of Enterprise Java Bean 560. The “local interface” of an Enterprise Java Bean Container is integrated as a component of a CORBA servant object 550, which in turn is a component of the CORBA server 540a. Thus, rather than integrating a resource adapter (comprising an encapsulated CORBA interface) with a J2EE application server as recited in claim 1, BLACK discloses integrating a local interface (of a Enterprise Java Bean Container) with a CORBA server 540a. Cited paragraph [0061] is consistent with the above-noted features of Figure 5B of BLACK. For example, paragraph [0061] of BLACK discloses “upon receiving (580) the request, the CORBA servant object 550 calls (582) the instance of the EJB 560 using the local interface of the EJB”. Accordingly, the cited teachings of BLACK do not disclose “integrating a resource adaptor with the J2EE application server, the resource adapter comprising an encapsulated CORBA interface” as recited in claim 1.

The cited teachings of BLACK also do not disclose that “J2EE server” 560 is remote from CORBA server 540a. As shown in Figure 5B, CORBA server 540a is provided in the same container 530a as the “J2EE server” 560. Further the container 530a is an element of a single disclosed middle-tier hardware component 520a in Figure 5B. Cited paragraph [0061] is consistent with the above-noted features of Figure 5B of BLACK. For example, paragraph [0061] of BLACK discloses “the CORBA servant object 550 is now locally located within the same container 530a” and “the call (582) to the instance of the EJB 560 by the CORBA servant... may now be implemented without using remote methods”. Accordingly, the cited teachings of

BLACK do not disclose that “J2EE server” 560 is remote from CORBA server 540a.

The cited teachings of BLACK further do not disclose that a connection between the “J2EE server” 560 and the CORBA server 540a is persistent. Rather, as described at paragraphs [0060] to [0062], the local interface of the Enterprise Java Beans is called upon receiving a request from a remote CORBA client 115, and the request is serviced based upon the nature of the request. For example, paragraph [0060] of BLACK discloses “if the request is to modify an existing account, than a CORBA servant object for account modification would be the correct CORBA servant object”. Accordingly, any connection established between the “J2EE server” 560 and the CORBA server 540a is temporary and established based upon the nature of a particular request from a CORBA client 115. Such a connection would not be interpreted as a persistent connection by one of ordinary skill in the art, at least insofar as such a connection is not disclosed as persisting after any particular call is terminated. Accordingly, the cited teachings of BLACK do not disclose that a connection between the “J2EE server” 560 and the CORBA server 540a is persistent.

As described above, there is no proper interpretation of the cited features relating to Figure 5B in BLACK as disclosing the combination of features recited in claim 1. Further, despite Applicants’ specific request, the Final Office Action fails to even specify which of the features of BLACK is believed to disclose an encapsulated CORBA interface to the CORBA enterprise information system, or a resource adapter comprising the encapsulated CORBA interface, as recited in claim 1. Accordingly, the Final Office Action fails to establish a proper *prima facie* rejection of claim

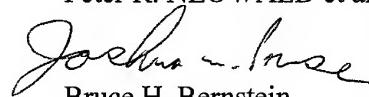
As described above, BLACK does not disclose at least the combination of claim 1, or the

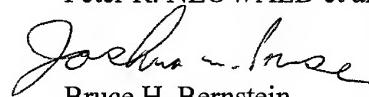
similar features of the computer readable medium of claim 9 or the Java 2 enterprise edition (J2EE) compliant application server of claim 17. Accordingly, claims 1, 9 and 17 are allowable over BLACK under 35 U.S.C. §102. Claims 2-8, 10-16 and 18-25 are allowable at least for depending, directly or indirectly, from an allowable independent claim, as well as for additional reasons related to their own recitations.

Accordingly, reconsideration and withdrawal of the rejection of claims 1, 9 and 17 over BLACK, as well as the rejection of claims 2-8, 10-16 and 18-25 under 35 U.S.C. §103 over BLACK in view of SCHUNK, is respectfully requested.

Should there be any questions or comments, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully submitted,
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November 29, 2007
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